

1) As a licensed Amateur Extra Class operator, I am concerned about the strong potential for interference to the established amateur and public safety communications if the implementation of the proposed Access BPL technology is allowed to go forward.

2) I typically operate on the 20M (14MHz) and 40M (7Mhz) amateur bands from my car (mobile). Often, while traveling in older, well established neighborhoods, typically provided electrical power over elevated power lines, the amount of broadband interference present almost completely precludes successful communications on the described bands. This is the current situation.

3) As demonstrated in the field tests performed by the ARRL and others, the introduction of Access BPL will result in an increase in the level of noise and interference across the HF bands from 1.8MHz to 30MHz, as well as the upper bands beyond, thereby completely blocking all communications by existing licensed operators and services, amateur and otherwise.

4) Several of the filings by the power companies and particularly the filing by Amperion, Inc., a manufacturer of the technology applied in the implementation of Access BPL, indicate that in their testing, they have "had no complaints or instances of interference at any of these deployment sites."

5) I would question this conclusion, particularly to ask for a detailed description of equipment used in their determination, as well as the specific procedures used for their measurements, etc. Further, I would ask whether any amateur radio operators were invited to participate in these tests and or were any amateur radio operators contacted to determine if their specific equipment suffered interference during the trial periods stated.

6) As previously noted, operation of an amateur radio station on the HF bands is a constant challenge to overcome the multiple sources of interference and noise at any given time. Allowing the technology of Access BPL, a demonstrated source of additional interference and noise to go forward, appears to be in direct conflict with the charter of the FCC. We have always been led to believe that it is the purpose and responsibility of the FCC to regulate and provide frequency band allocations such that services can operate in a non-interfering environment.

7) I am hereby registering my comments with the FCC in opposition to the statements made by the power companies and others that no appreciable interference to the existing licensed services would result from the implementation of Access BPL. I would also be more than happy to participate in any future testing as a licensed amateur radio operator in my area (Dallas/Fort Worth, TX). Thank-you for the opportunity to express my views and to provide these comments regarding the consideration of Access BPL.

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